

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	§ Chapter 11
STRUDEL HOLDINGS LLC and AVR AH LLC,	§	§ Case No. 23-90757 (CML)
Debtors. ¹	§	§ (Jointly Administered)

**SECOND SUPPLEMENTAL DECLARATION OF DOUGLAS J. BRICKLEY IN
SUPPORT OF MOTION TO AMEND ORDER (I) AUTHORIZING THE RETENTION
AND EMPLOYMENT OF STOUT RISIUS ROSS, LLC AS FINANCIAL ADVISOR FOR
THE DEBTORS AND DEBTORS IN POSSESSION; (II) AUTHORIZING THE
APPOINTMENT OF DOUGLAS J. BRICKLEY AS CHIEF RESTRUCTURING
OFFICER; AND (III) GRANTING RELATED RELIEF**

I, Douglas J. Brickley, declare as follows:

1. I am a Managing Director with the firm Stout Risius Ross, LLC (“Stout”), which has its principal office located at One South Wacker Drive, 38th Floor, Chicago, IL 60606. The Firm also maintains an office at 1000 Main Street, Suite 3200, Houston, TX 77002. Except where otherwise specifically noted, I have personal knowledge of the facts set forth below.

2. To the extent any information disclosed herein requires amendment or modification as additional party in interest information becomes available to Stout, a supplemental declaration will be submitted to this Court reflecting such amended or modified information.

3. I submit this Second Supplemental Declaration in support of the *Debtors'* *Emergency Motion to Amend Order (i) Authorizing the Retention and Employment of Stout Risius Ross, LLC, as Financial Advisor for the Debtors and Debtors in Possession; (ii) Authorizing the*

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: AVR AH LLC (0148) and Strudel Holdings LLC (5426). The Debtors' service address is: PO Box 4068, Aspen, CO 81612.

Appointment of Douglas J. Brickley as Chief Restructuring Officer; and (iii) Granting Related Relief (the “Motion to Amend”), as required by Bankruptcy Code Sections 327(a) and 329, Bankruptcy Rules 2014(a) and 2016(b), Bankruptcy Local Rules 2014-1(a) and 2016-1, and the U.S. Trustee Guidelines.

ADDITIONAL TRANSFERS FROM CHARIF SOUKI

4. On January 17, 2024, Souki filed his Statement in Connection with Funding of Professional Fees (Doc. No. 353) (the “Souki Statement”). The Souki Statement disclosed that Souki would directly pay Stout’s professional fees and that he would waive any claims against the Debtors in connection with such direct payments to Stout.

5. On January 18, 2024, prior to any objection being filed, Souki wired Stout the sum of \$75,000.00. Stout is holding these funds in trust and will not apply them absent approval of the Motion to Amend.

6. On January 26, 2024, Souki wired Stout an additional sum of \$60,000.00. Stout is holding these funds, totaling \$135,000.00, in trust and will not apply them absent approval of the Motion to Amend.

Pursuant to 28 U.S.C. § 1746, to the best of my knowledge, information and belief, and after reasonable inquiry, I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 30, 2023
Houston, Texas

/s Douglas J. Brickley
Douglas J. Brickley